## BEFORE THE COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

	)	
Investigation by the Department of Telecommunications	)	
and Energy on its own Motion Pursuant to G.L. c. 159,	)	D.T.E. 02-15
Sections 12 and 16, into the Regulations, Practices,	)	
Equipment, Appliances and Service of Network Plus, Inc.	)	
	_)	

## MOTION FOR LEAVE TO APPEAR PRO HAC VICE

The undersigned, counsel to Network Plus, Inc. ("Network Plus"), herewith respectfully seeks leave to appear as counsel of record and in such capacity to represent Network Plus before the Department in the above-captioned matter *pro hac vice*. The undersigned is a member in good standing of the District of Columbia and Maryland bars and has been actively practicing law in the District of Columbia since 1995.

Movant has been actively involved in other proceedings before the Department, and has also represented Network Plus before other state regulatory agencies and the Federal Communications Commission. The movant has not been the subject of any disciplinary proceedings.

WHEREFORE, the undersigned respectfully seeks permission to appear as counsel of record for Network Plus, Inc. in the above-captioned matter.

Respectfully submitted,

By: /s/\_\_\_\_\_

Kathleen L. Greenan
SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

3000 K Street, N.W., Suite 300 Washington, D.C. 20007-5116 Telephone: (202) 424-7500 Facsimile: (202) 424-7645

Counsel for Network Plus, Inc.

Dated: March 15, 2002